

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com

50 California Street, 22nd Floor
San Francisco, California 94111

Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Kevin P.B. Johnson (Bar No. 177129)

kevinjohnson@quinnemanuel.com

Victoria F. Maroulis (Bar No. 202603)

victoriamaroulis@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065-2139

Telephone: (650) 801-5000

Facsimile: (650) 801-5100

Attorneys for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Research America, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

HUAWEI TECHNOLOGIES CO., LTD., et al.,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

CASE NO. 16-cv-02787-WHO

**SAMSUNG'S UPDATED ELECTION
OF PRIOR ART**

SAMSUNG ELECTRONICS CO., LTD. &
SAMSUNG ELECTRONICS AMERICA, INC.

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO., LTD.,
HUAWEI DEVICE USA, INC., HUAWEI
TECHNOLOGIES USA, INC., & HISILICON
TECHNOLOGIES CO., LTD.,

Counterclaim-Defendants.

Pursuant to the Court's Order Regarding Case Management Proposals (Dkt. 143), the Court's Civil Pretrial Order (Dkt. 208), and the Court's Order to Adjust Certain Discovery Dates (Dkt. 272), Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America, Inc. (collectively, "Samsung") hereby narrow their invalidity references, systems, and combinations¹ to 25 as set forth below.

For prior art identified herein as a system or software, Samsung may rely on multiple documents describing that system or software to establish the relevant functionality of such a system or software. Samsung reserves the right to rely on live demonstrations of devices or software; manuals for devices or software; source code implementing the relevant functionality in software; and/or any other evidence describing the functionality of a system in order to demonstrate invalidity pursuant to that system.

U.S. Patent 8,416,892

1. R1-070189
2. R1-071471
3. R1-070189 + US Patent App. Pub. No. 2007/0230600
4. R1-071471 + US Patent App. Pub. No. 2007/0230600
5. R1-071471 + US Patent App. Pub. No. 2007/0230600 + R1-070189
6. R1-072330
7. US Patent No. 8,477,698 + US Patent App. Pub. No. 2007/0230600
8. R1-072330 + US Patent App. Pub. No. 2007/0230600

U.S. Patent 8,644,239

9. R1-071109

¹ This election is based on Huawei's Updated Election of Asserted Claims (Dkt. 318-3). Samsung reserves the right to amend this election should Huawei alter its election of asserted claims or the Court grant a motion to amend Samsung's invalidity contentions to add new prior art. Samsung reserves the right to rely on any reference or combination of references to show that the asserted claims are obvious in view of the knowledge of a person having ordinary skill in the art. Samsung reserves the right to rely on additional references for the purpose of demonstrating the scope and content of the prior art, a motivation to combine, and secondary considerations of obviousness.

10. R1-063356

11. R1-062174

12. U.S. Patent App. Pub. No. 2006/0039451 to Zhuang et al.

13. R1-071643

U.S. Patent 8,885,587

14. U.S. Patent No. 8,472,368

15. U.S. Patent No. 8,472,368 + R1-094545

16. U.S. Patent No. 9,036,564 + R1-094545

17. TS 36.213 v8.5.0 + R1-094545

18. TS 36.213 v8.5.0 + R1-094545 + U.S. Patent No. 8,472,368

19. TS 36.213 v8.5.0 + R1-094545 + U.S. Patent No. 9,036,564

U.S. Patent 8,724,613

20. R1-050654

21. R1-050654 + TR 25.814 v7.1.0

22. US Patent No. 7,620,061 + TR 25.814 v7.1.0

23. R1-050654 + TR 25.814 v7.1.0 + US Patent App. Pub. No. 2005/0249141

24. US Patent No. 7,620,061 + R1-050654 + US Patent App. Pub. No. 2005/0249141

25. US Patent No. 7,620,061 + TR 25.814 v7.1.0 + US Patent App. Pub. No.

2005/0249141

1 DATED: June 29, 2018

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

2
3 By /s/ Victoria F. Maroulis

4 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
5 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
6 50 California Street, 22nd Floor
San Francisco, California 94111
7 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

8 Kevin P.B. Johnson (Bar No. 177129)
kevinjohnson@quinnemanuel.com
9 Victoria F. Maroulis (Bar No. 202603)
victoriamaroulis@quinnemanuel.com
10 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065-2139
11 Telephone: (650) 801-5000
Facsimile: (650) 801-5100

12 *Attorneys for Samsung Electronics Co., Ltd.,*
13 *Samsung Electronics America, Inc., and*
14 *Samsung Research America, Inc.*